

### REMARKS

This Amendment is in response to the Office Action mailed on July 16, 2004. In the Office Action, claims 1-31 were rejected. With this Amendment, claims 1, 2, 4, 19, 25 and 26 are amended.

#### Claims 1-4 and 25-28

Claims 1-4 and 25-28 were rejected under 35 U.S.C § 102(e) as being anticipated by Grefenstette (US 6,289,304). Claim 4 was objected to because of informality. Accordingly, claim 4 has been amended.

Grefenstette discloses a system for summarizing text using part of speech (POS) data. Input text is tokenized or tagged with POS data. The POS data is used to determine which tokens should be removed during summarization. A reduction filter receives an input string of tagged and grouped tokens and provides an output string that is reduced from the input string depending on a selected reduction level.

Independent claim 1 is patentable over Grefenstette because Grefenstette does not generate "a plurality of compression options for each of a plurality of different portions of the body of text to compress the body of text based on the linguistic output". Further, independent claim 25 is patentable over Grefenstetter because Grefenstette does not provide a "compression form generator configured to generate a plurality of compressed forms of a portion of the body of text based on the linguistic analysis."

Grefenstette tags tokens of text with POS data and summarizes the text by deleting tokens in an input string that have certain POS tags. As discussed in col. 9, lines 44-64 and shown in FIG. 7, a level of reduction is selected. For example, by selecting level one, only proper name tokens remain and other tokens are deleted including subclauses. Therefore, the same deletion technique is applied to the entire text, <sup>and</sup> Grefenstette does not disclose generating a plurality of compressed forms for a portion of the text, much less generating a plurality of compression options for each of a plurality of different portions of the text.

According to the present invention of claims 1 and 25, however, the text is compressed by providing compression options for one or more portions of the body of text based on the

linguistic output. Therefore, different compression options can be applied to different portions of the text. The text, in its entirety, can thus be compressed differently from one portion to the next portion.

It is respectfully submitted that Greffenstette does not show a plurality of compression options applied to a portion of the body of text. Independent claims 1 and 25 are therefore, allowable over Greffenstette. In addition, by virtue of their dependency on claims 1 and 25 and as read in their entirety, claims 2-4 and 26-28 are also allowable over Greffenstette.

Claims 5-17, 19-24 and 29-31

Claims 5-17, 19-24 and 29-31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Grefenstette in view of Kudrolli et al. (US 6,279,018). Of these claims, claim 19 is an independent claim and the rest are dependent claims. Claims 5-17 ultimately depend from claim 1 and include further limitations to a compression identifier attribute for compression options. As amended, independent claim 19 is directed to a data structure formed from a linguistic analysis of a portion of a body of text indicative of a plurality of compressed forms of the portion of the body of text. The data structure includes a plurality of data fields that represent a plurality of compressed forms of the portion of the body of text. Claims 29-31 ultimately depend from claim 25 and include further limitations to the compression form generator.

Kudrolli et al. provides a method for abbreviating text. The method utilizes an abbreviation control data program, along with combinations of prioritized shortening methods in addition to glossaries of acronyms and word abbreviations. Special handling of input segments is also disclosed to omit spaces, convert enumeration words to numbers, and omit phonetically less significant characters.

The combination of cited references fails to teach or suggest a plurality of compression options or compression forms for a portion of the body of text as claimed in claims 1, 19 and 25. Kudrolli et al. abbreviates segments of input, but does not generate a plurality of options or forms for compressing segments of input. Grefenstette summarizes text by generating different levels of deletion for the entire text, but does not generate a plurality of compression options or compressed

forms for a portion of the body of text.

The combination of cited references also fails to teach or suggest a compression option related to a ShortForm attribute of the text based on a linguistic analysis or linguistic output as claimed in claims 5-17, 20-24 and 30-31. Instead, it seems that if one were to combine Kudrolli et al with Grefenstette, an input string would be tagged with POS data and summarized by deleting certain POS tags that correspond to a certain reduction level. The string would then undergo abbreviation based on the abbreviation control data program disclosed in Kudrolli et al.

It is respectfully submitted that the combination of cited references fails to teach or suggest a plurality of compression options or forms for a portion of the body of text and the cited references fail to teach or suggest a compression option related to a ShortForm attribute of the text based on a linguistic analysis or output. Independent claim 19 and claims 20-24, by virtue of their dependency and as read in their entirety, are patentable over the cited references. Dependent claims 5-17 and 29-31 are also patentable over the cited references.

#### Claim 18

Claim 18 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Grefenstette in view of Kudrolli et al. and further in view of Ueda (US 6,493,663). Claim 18 depends from claims 5 and 11 and includes a further limitation of using a tree for syntactic analysis, which has terminal and non-terminal nodes for application of compression rules.

Applicant submits that claim 18 is patentable over the cited references as depending on allowable dependent claims 5 and 11. Applicant also submits that claim 18 is allowable when read in its entirety. The combination of cited references fail to teach or suggest using a syntactic tree structure for compressing a body of text.

#### Conclusion

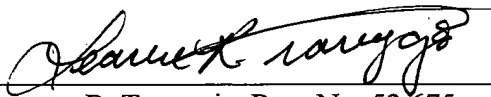
In light of the above remarks, claims 1-31 are patentable over the cited references. Reconsideration and allowance of the claims is respectfully Requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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By:

A handwritten signature in cursive script, appearing to read "Leanne R. Taveggia", written over a horizontal line.

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